

UNITED STATES BANKRUPTCY COURT DISTRICT  
OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(a)**

**CULLEN AND DYKMAN LLP**

433 Hackensack Avenue

Hackensack, NJ 07601

(201) 488-1300 (Tel)

(201) 488-6541 (Fax)

David Edelberg, Esq.

[dedelberg@cullenanddykman.com](mailto:dedelberg@cullenanddykman.com)

Proposed Counsel to Dianna Guadagnino

In Re:

Dianna Guadagnino,

Debtor.

Chapter 11

Case No.: 17-12951(RG)

**THE DEBTOR'S APPLICATION FOR AN ORDER EXTENDING  
TIME TO FILE MISSING DOCUMENTS**

**TO: THE HONORABLE ROSEMARY GAMBARDELLA, U.S.B.J.**

Dianna Guadagnino, the Debtor in the above captioned matter (the "Debtor"), through her attorneys, Cullen and Dykman LLP respectfully represents:

1. The Debtor submits this application pursuant to Rule 1007(a)(4) seeking the entry of an Order authorizing the extension of time to file her missing documents.
2. The Debtor is an individual with a residence at 287 Communipaw Avenue, Jersey City, New Jersey.
3. The Debtor also owns the real properties located in Jersey City at 104 Pine Street, 252 Suydan Street and 109 Lafayette Street.
4. In order to stay a sheriff's sale the Debtor filed an emergent Voluntary Petition

pursuant to Chapter 11 of the Bankruptcy Code on February 16, 2017 (the "Petition Date").

5. Following the filing the Debtor traveled to North Dakota to address some pressing personal matters.

6. As a result, to date the Debtor has been unable to file her Schedules of Assets and Liabilities, Statement of Financial Affairs and related documents (collectively, the "Missing Documents").

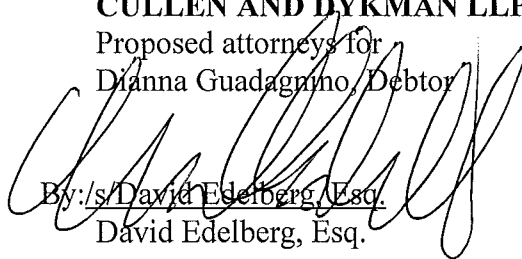
7. In addition, the lead counsel on this matter, David Edelberg, has previous plans to be out of state for one week starting March 4, 2017.

8. Consequently, the Debtor requires additional time to file the Missing Documents. Therefore, the Debtor requests an extension of time to March 24, 2017 to file the Missing Documents pursuant to Rule 1007 (a)(4).

**WHEREFORE**, the Debtor respectfully requests the entry of the Order submitted simultaneously herewith.

**CULLEN AND DYKMAN LLP**

Proposed attorneys for  
Dianna Guadagnino, Debtor

A large, stylized handwritten signature in black ink, appearing to read 'David Edelberg', is written over the typed name and title.

By: /s/ David Edelberg/Esq.  
David Edelberg, Esq.

Dated: March , 2017

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

CULLEN AND DYKMAN LLP  
433 Hackensack Avenue  
Hackensack, NJ 07601  
(201) 488-1300 (Tel)  
David Edelberg, Esq.  
Proposed Counsel to Dianna Guadagnino

In Re:

Dianna Guadagnion,

Debtor.

Case Number: 17-12951(RG)

Hearing Date: \_\_\_\_\_

Judge: Gambardella

Chapter: 11

Recommended Local Form:



Followed



Modified

**ORDER RE EXTENSION OF TIME  
TO FILE SCHEDULES**

The relief set forth on the following page is hereby **ORDERED**.

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The court having noted the debtor's request to extend time to file schedules, and for good cause shown, it is

ORDERED that the debtor's request is:

- ☐ Granted. The deadline to file schedules is extended to March 24, 2017.
- ☐ Denied.

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